

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RECEIVED

JUN 21 2021

U.S. BANKRUPTCY COURT, SDNY

In re:

DE GRISOGONO USA INC.

Debtor

Case No. 20-10389 (DSJ)

Chapter 7

**RESPONSE TO MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER TO APPROVE  
THE SALE OF CERTAIN ASSETS OF THE DEBTOR'S ESTATE FREE  
AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES PURSUANT  
TO 11 U.S.C. §§ 105 AND 363 AND RELATED RELIEF  
[Related to Doc. No. 88]**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

Cranehill Capital LLC ("Cranehill") files this Response to the Motion of Chapter 7 Trustee for an Order To Approve the Sale Of Certain Assets Of The Debtor's Estate Free and Clear Of Liens, Claims, Interests, And Encumbrances ("Response") and respectfully states as follows:

1. On May 8, 2021, Deborah J. Piazza, Chapter 7 Trustee ("Trustee"), filed the Motion of Chapter 7 Trustee for Order To approve the Sale of Certain Assets of The Debtor's Estate Free and Clear of Liens, Claims, Interests, And Encumbrances (Doc. No. 88) ("Sale Motion"), seeking an order authorizing the sale of certain property of the estate consisting of known and unknown assets, rights to payment, or claims, which have not been previously sold, assigned, or transferred ("Remnant Assets").
2. Pursuant to the Sale Motion, the Trustee proposes to sell the Remnant Assets to Oak Point Partners, Inc. ("Oak Point") for the amount of \$13,500.00.

3. After the Trustee filed the Sale Motion, Cranehill advised the Trustee that it was making a higher bid for the Remnant Assets. Accordingly, in order to place such offer before the Court and in the record, Cranehill files this Response and hereby makes its offer of \$15,000.00 to purchase the Remnant Assets on the same commercial terms as those provided to Oak Point.
4. Cranehill requests that it be given the opportunity to outbid any future bids on the Remnant Assets.

Date: June 14, 2021

Respectfully Submitted,

  
\_\_\_\_\_  
Gregory Mullen, Manager  
Cranehill Capital LLC  
6600 LBJ Freeway, Suite 210  
Dallas, Texas 75240  
(214) 373-1221  
gmullen@cranehill.com

**Certificate of Service**

The undersigned hereby certifies that the foregoing document was served on the Trustee via email and mail on June 14, 2021.

Deborah J. Piazza  
Tarter Krinsky  
1350 Broadway, 11th Floor  
New York, NY 10118  
(212) 216-8000  
dpiazza@tarterkrinsky.com

Robert A Wolf  
Tarter Krinsky  
1350 Broadway, 11th Floor  
New York, NY 10118  
(212) 216-8000  
rwolf@tarterkrinsky.com

  
\_\_\_\_\_  
Gregory Mullen